

EXHIBIT A

FILED
11/12/2019 12:00 AM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
2019L012444

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

SYLVIA BYRD,

Plaintiff,

versus

**DOLLAR TREE STORES, INC, a Foreign
Corporation d/b/a DOLLAR TREE #7261,**

Defendant.

Court #

7312400

COMPLAINT AT LAW

NOW COMES the Plaintiff, **SYLVIA BYRD**, by and through the **LAW OFFICES OF STEVEN J. MALMAN & ASSOCIATES, P.C.**, and complaining of the Defendant, **DOLLAR TREE STORES, INC, a Foreign Corporation d/b/a DOLLAR TREE #7261** states as follows:

COUNT I

(Negligence v. Dollar Tree)

1. That on or about October 13, 2018, the Defendant, **DOLLAR TREE STORES, INC, a Foreign Corporation**, owned, operated, managed, maintained and controlled a certain property and premises located at 209 East 103rd Street, in the City of Chicago, County of Cook, and State of Illinois, and held this facility, including the parking lot of the property and premises, open and available to members of the public.

2. That on or about October 13, 2018, Plaintiff, **SYLVIA BYRD**, was a patron of the aforesaid property and premises at all times mentioned herein was in the exercise of ordinary care for her own safety.

3. That at all times relevant hereto, as owner, operator and/or maintainer of such property, the Defendant, **DOLLAR TREE STORES, INC, a Foreign Corporation d/b/a DOLLAR TREE #7261**, had a duty to use reasonable care in the operation, management, maintenance and control of the aforesaid premises, and to exercise ordinary and reasonable care to make the said premises safe for the protection of all those legally along and upon the premises; specifically, to prevent the carpet located within said property from being hazardous and to prevent the carpet from endangering patrons at said property.

4. That on or about October 13, 2018, Plaintiff, **SYLVIA BYRD**, while walking through the store, slipped and fell on the carpet, resulting in injuries to her person, including a broken right foot and ankle, which required surgery.

5. Notwithstanding such duty, the Defendant, **DOLLAR TREE STORES, INC, a Foreign Corporation d/b/a DOLLAR TREE #7261**, was guilty of one or more of the following careless and negligent acts or omissions:

- a. Failed to maintain its property and premises in a safe condition;
- b. Failed to adequately mark said dangerous condition on its premise using signs or other indicators to warn patrons;
- c. Failed to take reasonable measures to protect those legally present on the aforesaid premise from the unsafe and dangerous condition;
- d. Failed to response to adequate notice that said dangerous condition existed; and,
- e. Was otherwise careless and negligent.

6. That Defendant, **DOLLAR TREE STORES, INC, a Foreign Corporation d/b/a DOLLAR TREE #7261**, knew or should have known of the aforesaid unsafe and dangerous

condition of the aforesaid mentioned property and premises.

7. That as a direct and proximate result of one or more of the aforesaid careless and negligent acts or omissions of the Defendant, **DOLLAR TREE STORES, INC, a Foreign Corporation d/b/a DOLLAR TREE #7261**, Plaintiff, **SYLVIA BYRD**, slipped and fell on the carpet, resulting in injuries including, but not limited to a broken right foot and ankle and all of which required hospitalization and surgery.

8. As a proximate result of the above occurrence, the Plaintiff was caused to suffer diverse temporary and permanent disabling injuries to his body by reason of which Plaintiff has expended and incurred obligations for medical expenses and care and will in the future expend and incur such further obligations; Plaintiff has been and will be prevented from attending to her usual affairs and duties and has lost and otherwise will continue to lose great gains she would otherwise have made and acquired.

WHEREFORE, the Plaintiff, **SYLVIA BYRD**, prays that judgment be entered in his favor and against the Defendant, **DOLLAR TREE STORES, INC, a Foreign Corporation d/b/a DOLLAR TREE #7261**, in an amount in excess of FIFTY-THOUSAND (\$50,000.00) DOLLARS, plus the costs of this action.

Respectfully Submitted,

/s/ Cory M. Boyer
Attorney for Plaintiff

Cory M. Boyer
LAW OFFICES OF STEVEN J. MALMAN
& ASSOCIATES, P.C.
205 West Randolph, Ste. 610
Chicago, Illinois 60606
(312) 629-0099
Attorney No. 31555
cboyer@malmanlaw.com

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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
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SYLVIA BYRD,

Plaintiff,

versus

**DOLLAR TREE STORES, INC, a Foreign
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Defendant.

Court #

SCR 222 AFFIDAVIT

I, Cory M. Boyer, having come to be sworn duly under oath, hereby state and affirm as follows:

1. That I am the attorney for the plaintiff in this matter.
2. That based upon my investigation and knowledge of this case plaintiff is seeking money damages in excess of \$50,000.00, further affiant sayeth not.

**LAW OFFICES OF STEVEN J. MALMAN
& ASSOCIATES, P.C.**

/s/ Cory M. Boyer
Attorney for Plaintiff

SUBSCRIBED AND SWORN TO
before me this 11th day
of November, 2019.

/s/ Raquel Renteria
Notary Public

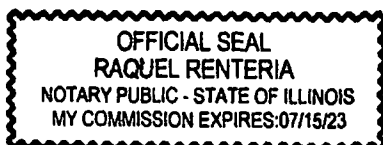


EXHIBIT B



Notice of Service of Process

LYN / ALL
Transmittal Number: 21048467
Date Processed: 01/30/2020

Primary Contact: Kathryn Smith
Dollar Tree, Inc.
500 Volvo Pkwy
Chesapeake, VA 23320-1604

Electronic copy provided to: JJ Jacobson-Allen

Entity: Dollar Tree Stores, Inc.
Entity ID Number 3697563

Entity Served: Dollar Tree Stores, Inc.

Title of Action: Sylvia Byrd vs. Dollar Tree Stores, Inc d/b/a Dollar Tree #7261

Matter Name/ID: Sylvia Byrd vs. Dollar Tree Stores, Inc d/b/a Dollar Tree #7261 (9979231)

Document(s) Type: Summons/Complaint

Nature of Action: Personal Injury

Court/Agency: Cook County Circuit Court, IL

Case/Reference No: 2019L012444

Jurisdiction Served: Illinois

Date Served on CSC: 01/30/2020

Answer or Appearance Due: 30 Days

Originally Served On: CSC

How Served: Personal Service

Sender Information: Cory M. Boyer
312-629-0099

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

2120 - Served
2220 - Not Served
2320 - Served by Mail
2420 - Served by Publication
SUMMONS

2121 - Served
2221 - Not Served
2321 - Served by Mail
2421 - Served by Publication
ALIAS SUMMONS

FILED
1/13/2020 10:22 AM
DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
2019L012444

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

SYLVIA BYRD,

Plaintiff,

versus

**DOLLAR TREE STORES, INC, a Foreign Corporation
d/b/a DOLLAR TREE #7261,**

Defendant.

Court # 19 L 12444

Please Serve:

Dollar Tree Stores, Inc.

Through its registered agent

Illinois Corporation Service

801 Adlai Stevenson Drive

Springfield, IL 62703

ALIAS SUMMONS

TO EACH DEFENDANT:

YOU ARE SUMMONED and required to file an answer in this case, or otherwise file your appearance in the office of the clerk of this court (located in the Richard J. Daley Center, Room* 801 Chicago, Illinois 60602), within 30 days after service of this summons, not counting the day of service. IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF ASKED FOR IN THE COMPLAINT, A COPY OF WHICH IS HERETO ATTACHED.

To the officer:

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed. This summons may not be served later than 30 days after its date.

WITNESS



1/13/2020

1/13/2020 10:22 AM DOROTHY BROWN

the Court

Law Offices of Steven J. Malman
& Associates, P.C.
Attorney for Plaintiff(s)
205 West Randolph St., Ste. 610
Chicago, IL 60606
(312) 629-0099
cboyer@malmanlaw.com
#31555

Date of Service _____
(To be inserted by officer on copy left with
defendant or other person)

Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois

EXHIBIT C

Entity Information

Entity Information

Entity Name: DOLLAR TREE STORES, INC.

Entity ID: 02938496

Entity Type: Stock Corporation

Entity Status: **Active**

Formation Date: 10/15/1986

Reason for Status: Active and In Good Standing

VA Qualification Date: 10/15/1986

Status Date: 12/01/2004

Industry Code: 0 - General

Period of Duration: Perpetual

Jurisdiction: VA

Annual Report Due Date: N/A

Registration Fee Due Date: Not Required

Charter Fee: \$0.00

Registered Agent Information

RA Type: Entity

Locality: RICHMOND CITY

RA Qualification: BUSINESS ENTITY THAT IS AUTHORIZED TO
TRANSACTION BUSINESS IN VIRGINIA

Name: CORPORATION SERVICE COMPANY

Registered Office Address: 100 Shockoe Slip Fl 2, Richmond, VA, 23219 -
4100, USA

Privacy Policy (<https://www.scc.virginia.gov/privacy.aspx>)

Contact Us

(https://www.scc.virginia.gov/ask/ask_contact.aspx)



Principal Office Address

Address: 500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA

Principal Information

Title	Director	Name	Address	Last Updated
ASST SECRETARY	No		500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/24/2018
Vice President	No		500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/24/2018
CFO	Yes		500 VOLVO PARKWAY, CHESAPEAKE, VA, 23320 - 0000, USA	09/24/2018
PRESIDENT/COO	No		500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/24/2018
VP/T/AS	No		500 VOLVO PKWY, CHESAPEAKE, VA, 23320 - 0000, USA	09/24/2018

Current Shares

Total Shares: 5000

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[Name History](#)
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